VENTURA COUNTYWIDE STORMWATER QUALITY MANAGEMENT PROGRAM

REPORT OF WASTE DISCHARGE

PREPARED BY VENTURA COUNTY WATERSHED PROTECTION DISTRICT

JANUARY 2005

Table of Contents

SECTION ONE
INTRODUCTION

PROGRAM DESCRIPTION

The Ventura County Watershed Protection District (VCWPD), the County of Ventura, and the Cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, and Thousand Oaks (hereinafter referred to separately as Co-permittees) have joined together to form the Ventura Countywide Stormwater Quality Management Program to control the discharge of stormwater and urban runoff from municipal separate storm sewer systems (MS4). Order No. 94-082 adopted by the California Regional Water Quality Control Board (RWQCB), Los Angeles Region, on August 22, 1994, issued the first National Pollutant Discharge Elimination System (NPDES) Permit to the Ventura County Co-permittees. Order No. 00-108, adopted by the RWQCB on July 27, 2000, re-issued the NPDES Permit, and is hereafter referred to as the Permit.

This Report of Waste Discharge (ROWD) is an application for renewal of the 2000 Permit (NPDES No. 00-108). Each of the Co-permittees affirmed their intent to participate in this application for renewal of the countywide MS4 permit. The 2000 Permit expires on July 27, 2005 and requires that this ROWD be submitted no later than January 27, 2005 (180 days in advance of the expiration date). The 2000 Permit specifies that the ROWD shall be "in accordance with Title 23, California Code of Regulation".

The ROWD is comprised of a summary of the Ventura Countywide Stormwater Quality Management Program, which includes a description of Ventura County watersheds and Program accomplishments, and a draft permit outlining the activities and goals for the Program.

The Ventura Countywide Stormwater Quality Management Program (the Program) was established pursuant to Section 402(p) of the Federal Clean Water Act (CWA), which requires that a NPDES Permit regulate all point source discharges of pollutants into Waters of the United States, including discharges from municipal separate storm sewer systems (MS4s). The NPDES Permit for the Ventura County Co-permittees covers the urban areas of the county and regulates discharges from municipal storm drain systems in Ventura County. Figure 1-1, located on page 2, shows the area covered by the Ventura County Stormwater Management Plan (SMP).

The 2000 Permit recognizes that there are areas of Ventura County within the Los Angeles Regional Board area that are not subject to current federal stormwater regulation, are not under the jurisdiction of the State of California, or not under the jurisdiction of the Co-permittees. Such areas or entities include:

- Federal and state lands, including, but not limited to, military bases, national forests, hospitals, colleges and universities, and highways;
- Utilities and special districts;
- Native American tribal lands;

- Non-urbanized areas; and
- Agricultural lands

These areas are excluded from coverage under the 2000 Permit and should continue as such. However, the Co-permittees anticipate that other stormwater dischargers within Ventura County (including some of the areas or entities just listed) may be permitted separately under Phase II of the federal stormwater regulations. Other stormwater dischargers may be issued Waste Discharge Requirements (WDRs) by the Los Angeles Regional Board through the authority under the Porter-Cologne Act, through the Total Maximum Daily Load (TMDL) program, or through other regulatory programs.

The SMP was developed in late 2000 to outline Permit implementation activities. During the term of the next 5-year permit (2005 Permit), the Co-permittees will be revising the SMP to include components developed during the term of the 2000 Permit and to address requirements of the 2005 Permit. The monitoring program will also be revised and will be incorporated into the SMP.

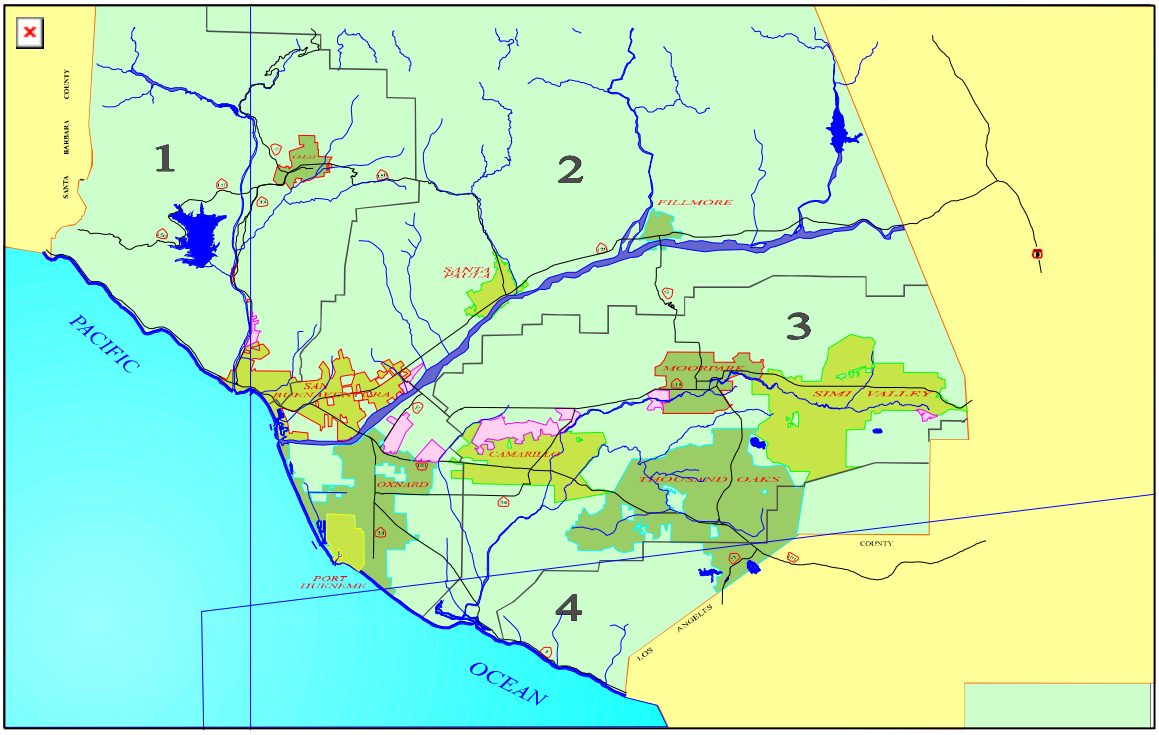


Figure 1-1
AREA COVERED BY THE STORMWATER MANAGEMENT PLAN

SECTION TWO
VENTURA COUNTY WATERSHEDS

SURFACE WATER BODIES

The area subject to permit requirements includes all areas within the boundaries of the cities as well as unincorporated areas of Ventura County defined as urban by the U.S. Census Bureau. Municipal storm drain systems in this area discharge either directly into the Pacific Ocean or one of five major water bodies:

WATER BODU	RECEIVES MUNICIPAL STORM DRAIN DISCHRGES FROM:
Ventura River	City of Ojai, City of San Buenaventura (part), unincorporated Ventura County (part)
Santa Clara River	City of Fillmore, City of Oxnard (part), City of San Buenaventura (part), City of Santa Paula, unincorporated Ventura County (part)
Callgeuas Creek	City of Camarillo, City of Moorpark, City of Simi Valley, City of Thousand Oaks (part), unincorporated Ventura County
Malibu Creek	City of Thousand Oaks (part), unincorporated Ventura County
Bays/Estuaries	City of Oxnard (part), City of Port Hueneme, City of San Buenaventura (part)

The beneficial uses of these surface water bodies include: municipal and domestic water supply, agricultural water supply, industrial service water supply, industrial process water supply, groundwater recharge, water contact recreation, non-contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat, and preservation of rare and endangered species. Several of these surface water bodies have been identified by the State of California as "impaired" because they do not meet water quality standards for designated beneficial uses.

LAND USE

Ventura County's population has grown from approximately 669,016 in 1990 to approximately 753,000 in 2000. The areas of most significant growth in population include the cities of Oxnard, Simi Valley, and Thousand Oaks. The long-range population growth forecast indicates that the population of the permitted area will increase to approximately 915,000 by 2020.

Land use within the region includes open space, residential, commercial, light industry, heavy industrial and agriculture. The agricultural land uses includes citrus and fruit orchards; row crops such as strawberries; alfalfa, irrigated and dry pasturelands, application of biosolids, composting; poultry and dairies. However, during the 2000 permit term, the conversion of agricultural lands and open space to other "developed" land uses has been ongoing and will continue.

The County and City Co-permittees each own, operate, and maintain a MS4 within their respective jurisdiction. VCWPD is a regional agency that owns, operates, and maintains a MS4 countywide, with facilities located within the jurisdictional boundaries of the Co-permittees. The Permit regulates these MS4s.

The MS4s in the permitted area of Ventura County, hereinafter referred to as a storm drain system, is defined as:

"…the conveyance or system of conveyance (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a Co-permittee, that is designed or used for collecting or conveying storm water, which is not a combined sewer, and which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

For the purposes of each Co-permittee, the length of their storm drain system is the total length of all storm drain systems owned and operated by the Co-permittee. The length of each storm drain system is the centerline distance, in linear feet, between the downstream end and upstream end of each storm drain system. The downstream end is defined as the point of discharge to the waters of the United States, or to a MS4 that is not owned or operated by the Co-permittee. The upstream end is defined as the point of entry to any storm drain system.

Table 1 (shown below) summarizes the length of the storm drain facilities owned, operated, and maintained by each Co-permittee.

CO-PERMITTEE AGENCIES	OPEN CHANNEL SOFT SIDE AND BOTTOM	OPEN CHANNEL HARD SIDE OR BOTTOM	OPEN CHANNELS HARD SIDE AND BOTTOM	UNDERGROUNG STORM DRAINS	DITCHES	GUTTERS	OTHER STORM DRAIN	TOTAL LENGTH
Principal Co-permittee								
VCWPD	409,728	307,296	204,864	102,432	N/A	N/A	N/A	1,024,320
Co-permittees								
City of Camarillo				400,000	32,178	2,956,800	1,095	3,390,073
County of Ventura	29,568	22,176	14,784	7,392	N/A	N/A	N/A	73,920
City of Fillmore			300	35,500	1,000	316,800		353,600
City of Moorpark				136,000	10,000	940,000	22	1,086,022
City of Ojai			7,920	31,680		337,920		377,520
City of Oxnard	63,360	15,840	26,400	211,200		2,112,000		2,428,800
City of Port Hueneme	5,000			66,000		440,000		511,000
City of San Buenaventura	9,477		9,869		76,603		1,708	97,657
City of Santa Paula	582			96,817	18,174	633,600		749,173
City of Simi Valley	4,000		1,000	553,115		3,146,880		3,704,995
City of Thousand Oaks		534		790,164		5,533,440		6,324,138

■ *Table 1: Storm Drain System in linear feet*

SECTION THREE
PROGRAM ACCOMPLISHMENTS

PROGRAM MANAGEMENT AND ADMINISTRATION

During the term of the 2000 Permit, the Principal Co-permittee and Co-permittees have operated under an Implementation Agreement that sets forth the responsibilities of the Principal Co-Co-permittee and Co-permittees are identified below.

Principal Co-permittee (VCWPD) responsibilities include:

- Comply with the requirements of the Permit within its own jurisdictional boundaries (including the review of projects connected to VCWPD storm drain systems)
- Operate and maintain those storm drains owned and operated by VCWPD, including those located within the jurisdiction of the Co-permittees
- Coordinate Permit activities
- Serve as liaison between the Co-permittees and the RWQCB. This includes:
    1) Set time schedules for the performance of activities
    2) Prepare regulatory reports and seek Co-permittee review
    3) Forward Co-permittee information to the RWQCB
    4) Arrange for public review, when needed
    5) Update Co-permittees on RWQCB and EPA regulations
    6) Arrange for collection and payment of Permit renewal fee
- Secure services of consultants with concurrence of Co-permittees
- Manage the stormwater quality monitoring program
- Convene the Management Committee and subcommittee meetings
- Assign Co-permittees to subcommittees
- Attend subcommittee meetings
- Manage the countywide educational and outreach program

Co-permittee responsibilities:

- Comply with the requirements of the Permit within their own jurisdictional boundaries
- Provide Permit submittals to the Principal Co-permittee
- Develop a program to address the following within its jurisdictional boundaries:

1) Implementation of controls to reduce pollution from industrial/commercial and residential areas
2) Implementation of structural/non-structural controls on land development and construction sites
3) Implementation of controls to reduce pollution from maintenance activities
4) Elimination of illegal connections and improper disposal of hazardous materials or wastes
5) Inspection, monitoring and control programs for industrial facilities
6) Implementation of public awareness and training programs

VCWPD, as Principal Co-permittee provides for the overall program management and coordination with the RWQCB. To oversee program development and provide guidance, senior staff from all Co-permittee agencies attend a Management Committee, chaired by VCWPD. The Management Committee reviews materials developed by the subcommittees, provides comments and approves or rejects program activities. Approved program materials are distributed to all Co-permittees for their use in implementing local stormwater program activities.

Five subcommittees composed of Co-permittee staff from various departments or contracted representatives meet as needed to discuss program implementation activities, develop program materials and advise and make recommendations to the Management Committee.

Each Co-permittee serves on one or more subcommittee. Subcommittee assignments are based on city populations. The subcommittees include the following:

- Programs for Residents
- Programs for Industrial/Commercial Businesses and Illicit Discharges (one subcommittee covers two program areas)
- Programs for Planning and Land Development
- Programs for Construction Sites
- Programs for Public Agency Activities

PUBLIC EDUCATION AND OUTREACH

The Co-permittees have developed and implemented a Program for Residents of Ventura County that is a combination of educational outreach tools and activities to increase the knowledge of target audiences about the impacts of stormwater pollution and potential solutions to reduce the problems caused; to change the behavior of target audiences in implementing appropriate solutions; and to involve and engage the different communities throughout the County in mitigating the impacts of stormwater pollution on rivers, stream and the ocean.

Through a unified and coordinated effort, the Co-permittees aim to:

- Change the mind-set of a large, diverse population while educating target audiences about solutions to stormwater pollution

- Create synergy by implementing an integrated countywide campaign and by unifying multiple pollution prevention efforts
- Maximize impact of educational campaigns by targeting more than one audience
- Build bridges and forge partnerships that integrate city and jurisdictional programs

The public education program uses numerous outreach methods to reach audiences of all ages and interests. Table 2 (shown below) presents the various outreach methods for different audiences.

AUDIENCE	OUTREACH METHODS
Residents: General Public	• Pamphlets • Brochures • Radio • TV/Cable • Utility Bill Inserts • Direct Mail • Advertisements • Community Events • Presentations • Surveys
New Home Owners	• Brochures • Tear-off Fact Sheets
Groundskeepers; Home Gardens	• Focused Brochures • Workshops
Commercial; Industrial	• Brochures • Posters
Students	• Classroom Presentations • Radio • Videos • Workbook Materials • Brochures • Radio Script Contests
General Contractors; Construction Contractors	• Focused Brochures • Workshops • Information at Public Permit Counters • Community Events
Architects; Developers	• Focused Brochures • Information at Public Permit Counters • Workshops

■ *Table 2: Public Education and Outreach Methods*

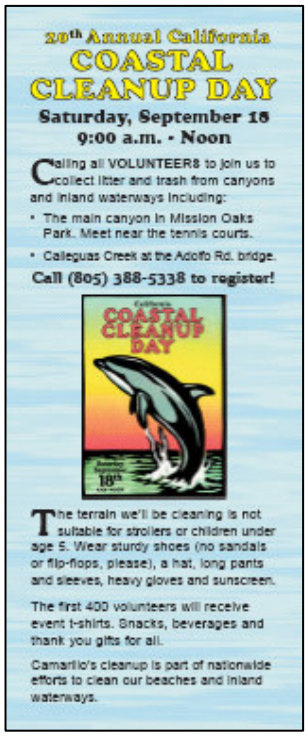
To leverage limited resources, the Co-permittees have frequently partnered with various groups and/or events (Building Industry Association, Ventura County Environmental & Energy Resources Department, CREEC Network, Coastal Cleanup Commission, and the Ventura County Science Fair) to promote conservation, pollution prevention and environmental awareness. The education program also expands outreach opportunities by working with entities such as the Ventura County Farm Bureau to promote proper use of pesticides and herbicides and source control Best Management Practices (BMPs).

The public education program includes an Internet website that provides information to residents and businesses about storm water pollution problems and offers simple pollution prevention activities (BMPs) to help keep local rivers, streams and ocean clean. The website also provides county residents contact information for reporting illicit discharges or clogged catch basins. The website address is: www.vcstormwater.org.

Recent outreach material has included:

- BMP fact sheet and poster for horse owners and the equine industry
- A general outreach brochure that provides BMPs for new home owners and the contractors they may hire to perform work for them
- Educational brochure for industrial facilities on the State General Industrial Permit requirements and program

COASTAL CLEANUP DAY ANNUAL EVENT



Since 1996, the Co-permittees have joined with the California Coastal Commission in their Coastal Cleanup Day program, which takes place every year on the third Saturday of September. Coming at the end of the summer beach season and near the start of the school year, Coastal Cleanup Day is a great way for families, students, service groups and neighbors to join together to help clean and beautify local beaches and inland waterways.

Each year, the Co-permittees continue to expand the scope and success of this event by increasing the number of beach and inland waterways cleaned and encouraging additional volunteer turnout. This past year, Coastal Cleanup Day took place on September 20, 2004. This permit year, a total of 2,220 volunteers participated and helped remove a total 14,632 pounds of trash and 1,919 pounds of recyclables from local beaches and inland waterways.

This volunteer program continues to be a huge success, not only in cleaning local sensitive environments but also in creating a heightened awareness on proper trash disposal and its benefit to stormwater quality.

RADIO SCRIPT CONTEST

Starting in 1998, the Co-permittees have targeted countywide middle school students to write scripts concerning stormwater pollution prevention for public service announcements. Of those scripts submitted, the top three are recorded for local radio stations.

Winning scripts are aired as part of the Countywide Radio Script Campaign to educate local residents on the importance of stormwater pollution prevention. The campaign is held every other year. In previous years, some of the scripts were aired on local television stations, including local cable television channels in the cities of Moorpark and San Buenaventura. In an effort to reach the widest audience possible, the Co-permittees utilized six local radio stations (including one Spanish language) and 15 television stations that serve a large, mixed population (including sport network channels).

PET WASTE CAMPAIGN

The Pet Waste Program was developed by the Co-permittees to educate pet owners on pet waste contributions to bacterial contamination of the ocean and streams. In 1999, the Co-permittees installed 75 dispensers and ordered 170,400 pet waste bags to dispose of pet waste in public areas. This program has been a huge success with the demand for more dispensers and pet waste bags growing annually.

This past year, VCWPD purchased an additional 35 dispensers and 699,000 pet waste bags for Co-permittee use to bring the total number of dispensers to 357 countywide. Due to the high demand in key locations, some Co-permittees have purchased additional pet waste bags (886,000) to keep dispensers stocked all year long for a total of 1,585,000.

As part of the Pet Waste Program, VCWPD developed and distributed a pet waste flyer, entitled "What's the Scoop?" which provides pet owners with tips for a healthy pet and a healthier environment. The flyer educates pet owners on the connection between pet waste carried down gutters and storm drains and bacterial pollution, which can contribute to beach closures. In addition the flyer emphasizes pollution prevention practices, such as carrying a pooper-scooper or plastic bag to pick up pet waste, and proper disposal to the sanitary sewer or place in a designated receptacle; and telling friends and neighbors about the ill effects of animal waste on the environment. Co-permittees distribute these flyers at pet stores, veterinary offices, and at outreach events. The flyer has been a big success, and was published in both English and Spanish.

VENTURA COUNTYWIDE FAIR

The annual Ventura Countywide Fair presents a wonderful opportunity for the Co-permittees to interact with residents and provide information on the Countywide Stormwater Management Program. The Co-permittees have used a variety of outreach tools at the Fair, including the Pollution Prevention House, an interactive walk-through display. The text and outreach materials used in the House address stormwater pollution prevention, recycling, pest management and water conservation practices.

In 2003, the Co-permittees showcased the TidePool Cruiser at the Fair. This mobile unit shows an up-close view of the storm drain, a marine touch tank and a general store that makes the connection between what is placed in the storm drain and its impact on marine life.

In addition to staffing the display, the Co-permittees survey Fair attendees on stormwater issues. A total of 4,897 surveys were completed over the two-week event. Survey results are analyzed to refine future public outreach efforts.

VENTURA COUNTY SCIENCE FAIR

The Ventura County Science Fair is an annual event, where fifth through twelfth grade students participate in a countywide competition for the best science project in their age group. As Principal Co-permittee, VCWPD coordinates the participation of the Co-permittees as judges in this event. The Co-permittees select three student projects for a special category Stormwater Quality Award. The projects are selected based on their relevancy to stormwater issues and level of understanding of stormwater on water quality. This past year, the City of Fillmore secured donations for the winning entries.

TIDEPOOL CRUISER

Over the past two years, some Co-permittees have utilized the TidePool Cruiser in their elementary school educational outreach efforts. This program is designed to teach children (and by extension their parents) about the hazards of non-point source stormwater pollution. In an innovative, hands-on and exciting manner participants learn of the connection between the introduction of pollutants through the storm drain system and their impact on the marine environment. In addition, solutions are provided and suggestions made on how the students can reduce pollution from littering beaches and fouling local rivers, streams and ocean.

QUARTERLY CITY NEWSLETTERS

Recently, some Co-permittees have started to include stormwater issues in additional city-specific materials. For example, this past year, the cities of Camarillo, Moorpark and Port Hueneme published several stormwater related articles in their city's quarterly newsletter. These articles provide local residents with stormwater pollution prevention tips and keeps them informed on local water quality projects and progress made on their behalf to improve their local environment. The cities of Camarillo, Moorpark and Port Hueneme should be commended for this innovative endeavor to use additional tools to provide stormwater education and pollution prevention techniques.

MOBILE SATELLITE CITY HALL

Over the past two years, the City of Oxnard has hosted a Mobile Satellite City Hall in centralized city locations in an ongoing effort to educate a greater number of local residents on stormwater pollution prevention methods and on the importance of taking ownership of their local environment. These events provide Oxnard residents with the opportunity to voice their water quality concerns to city department/division appointed representatives, citywide enhancement staff, city council members, neighborhood council executive boards and business community representatives. This innovative approach of providing educational outreach to the general public has been extremely successful in promoting a positive environmental awareness, sound stormwater pollution prevention practices and illicit discharge identification/abatement throughout the city's targeted demographic areas.

CITY CORPS STORM DRAIN KEEPER PROGRAM

In an effort to improve water quality and the aesthetics of local waterways, the City of Oxnard has entered into an agreement with Oxnard City Corps to maintain Oxnard West, "J" Street Drain and Oxnard Industrial Drain. Oxnard City Corps is a program that seeks at-risk youth within Oxnard and provides them with needed job skills. Money from SEP funds was utilized to form the Storm Drain Keeper Program.


City Corps volunteers working together.

The program's primary activities focus upon: continuous patrolling of open channel storm drains and removal of trash, excess sediment, vegetation and graffiti from the storm drains. On a quarterly basis the City Corps also assists the City of Oxnard monitor the water quality in numerous storm drains and storm drain channels. In addition, City Corps has played an important role in promoting sound stormwater pollution prevention techniques to the general public during such city events as the Water Fair and Earth Day. City Corps has removed several tons of trash and debris from channels and has made a positive impact in minimizing the trash and pollutants that are carried with it into receiving water bodies.

VOLUNTEER PROGRAMS

Several Co-permittees have established volunteer programs to address stormwater and water quality issues. For example, the City of Camarillo has continued their successful household

hazardous waste disposal program, where residents can dispose of their waste at city collection events held one weekend a month. Additionally, the City of Port Hueneme has developed an "Adopt a Storm Drain" Program, which allows individuals to select an area of interest and help the local environment by periodically cleaning a storm drain(s).

The City of Simi Valley has organized a "Neighborhood Council Arroyo Cleanup Event" for the past two years. This cleanup event is held in addition to the city's annual participation in Coastal Cleanup Day and is a huge success with local volunteers demonstrating more ownership and responsibility for their local environment and waterways.

Last year, the City of Santa Paula held its first Annual Santa Paula Beautiful Event. This clean up event targeted local streets, parks, parkways and public open spaces. Over 100 residents volunteered their time and collected 624 tons of trash.

The City of San Buenaventura continued their "Partners in Progress for a Beautiful Ventura" program where committed volunteers work together to collect trash along the beach. This program offers the unique opportunity for one-on-one interaction between local residents and city representatives. The city continues to stress environmental stewardship and pollution prevention measures to their residents with very positive results.

In addition, the City of Thousand Oaks, through their Community Enhancement Program, has awarded over $30,000 to non-profit groups for various projects including several creek cleanup events. This program also funds the City's participation in the Adopt-a-Highway program where more than 4.5 tons of trash was collected from city freeway ramps this past year. Additional clean up efforts along the Highway 23/101 interchange removed a further 2 tons of litter. This progressive and innovative program also provides free dumpsters to qualifying neighborhoods. This program is especially noteworthy for it not only removes unsightly and offensive trash but also provides an easy way for residents to dispose of unwanted items and discourage the illicit dumping of trash.

These activities and programs underscore the Co-permittees commitment to water quality and to effect change and improvement in the streams, rivers and channels of Ventura County.

COMMERCIAL/INDUSTRIAL PROGRAM

The Co-permittees have developed and implemented a Program for Industrial/Commercial Businesses that incorporates educational outreach and a site visit/inspection program designed to increase the knowledge of target audiences about the impacts of stormwater pollution and potential solutions to reduce problems caused; to change the behavior of target audiences through implementation of appropriate solutions; and to involve and engage the various business communities throughout the County in mitigating impacts of stormwater pollution on our rivers, streams and ocean.

Recent program activities include an extensive public educational outreach program to target industrial facilities potentially subject to the State General Industrial Permit. The Co-permittees targeted facilities using a variety of resources:

- State Water Resources Control Board (SWRCB) database of facilities covered by the General Industrial Permit

- Hazardous materials inventories maintained by fire or environmental health departments
- List of facilities subject to local wastewater utility's industrial pretreatment programs
- City business license records
- Commercially available business listings (e.g. the Dun & Bradstreet database)
- Telephone book business listings
- Non-filers database
- Letters/Use surveys/Mailer with response requested/Checklist, etc.

This program has been hugely successful with a total of 984 facilities countywide educated on the State General Industrial Permit program. As part of this educational outreach the Co-permittees identified a total of 365 potential non-filers. This information has been crucial to the RWQCB's efforts to administer and enforce their program.

In addition, the Co-permittees have focused on maximizing their stormwater message by reaching larger audiences through the Program's website (www.vcstormwater.org). The Co-permittees provide additional information and guidance for the business community on practical solutions for stormwater pollution prevention by providing a series of Clean Business Program Fact Sheets on the website. These fact sheets address the following topics and activities:

- Storm Drains and Discharge Points
- Building and Grounds Maintenance
- Building Repair, Remodeling and Construction
- Maintenance and Cleaning of Floors and Outside Impervious Surfaces
- Materials Loading, Unloading and Storage
- Vehicle and Equipment Fueling
- Vehicle and Equipment Operation, Maintenance and Repair
- Vehicle and Equipment Washing and Cleaning
- Waste Management and Disposal
- Waste Recycling and Disposal Reference Guide

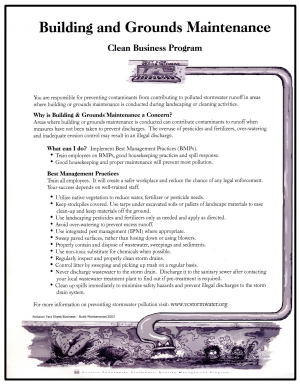
PROGRAM HIGHLIGHTS

CLEAN BUSINESS FACT SHEETS

In 2002, the Co-permittees focused on maximizing their stormwater message by targeting those business activities that have the highest potential to contribute pollutants to the storm drain system. The Co-permittees sought to provide additional information and guidance to the business community on practical solutions for stormwater pollution prevention in those areas/activities that can be most problematic.

The Co-permittees developed a series of Clean Business Program Fact Sheets, which addressed the following topics and activities:

- Building & Grounds Maintenance
- Building Repair, Remodeling & Construction
- Maintenance & Cleaning of Floors and Outside Impervious Surfaces
- Materials Loading, Unloading & Storage
- Vehicle & Equipment Fueling
- Vehicle & Equipment Washing & Cleaning
- Waste Management & Disposal
- Waste Recycling & Disposal Reference Guide


Building and Grounds Maintenance

Clean Business Program

You are responsible for preventing contaminants from contributing to polluted stormwater runoff in areas where building or grounds maintenance is conducted during landscaping or cleaning activities.

Why is Building & Grounds Maintenance a Concern?

Areas where building or grounds maintenance is conducted can contribute contaminants to runoff when measures have not been taken to prevent discharges. The overuse of pesticides and fertilizers, over-watering and inadequate erosion control may result in an illegal discharge.

What can I do? Implement Best Management Practices (BMPs).

- Train employees on BMPs, good housekeeping practices and spill response.
- Good housekeeping and proper maintenance will prevent most pollution.

Best Management Practices

Train all employees. It will create a safer workplace and reduce the chance of any legal enforcement. Your success depends on well-trained staff.

- Utilize native vegetation to reduce water, fertilizer or pesticide needs.
- Keep stockpiles covered. Use tarps under excavated soils or pallets of landscape materials to ease clean-up and keep materials off the ground.
- Use landscaping pesticides and fertilizers only as needed and apply as directed.
- Avoid over-watering to prevent excess runoff.
- Use integrated pest management (IPM) where appropriate.
- Sweep paved surfaces, rather than hosing down or using blowers.
- Properly contain and dispose of wastewater, sweepings and sediments.
- Use dry cleanup methods when cleaning is possible.
- Regularly inspect and properly clean storm drains.
- Control litter by sweeping and picking up trash on a regular basis.
- Never discharge wastewater to the storm drain. Discharge it to the sanitary sewer after contacting your local wastewater treatment plant to find out if pre-treatment is required.
- Clean up spills immediately to minimize safety hazards and prevent illegal discharges to the storm drain system.

For more information on preventing stormwater pollution visit: www.vcstormwater.org

Clean Business Fact Sheet

These fact sheets have been posted on the Program's website (www.vcstormwater.org). In addition, the Co-permittees provide these fact sheets during routine inspections and when appropriate.

COORDINATION WITH EHD FOR COUNTYWIDE CONSISTENCY

The Co-permittees continued to emphasize consistency among inspection programs, both in terms of requirements and procedures countywide. The Co-permittees appreciate the importance of providing a "level playing field" for the business community, and of requiring compliance in a similar, and clear manner. In order to facilitate countywide consistency, the Co-permittees meet regularly to discuss coordination of efforts and strategies for the inspection program at the Business & Illicit Discharge/Illegal Connection Subcommittee. As a part of this effort the Co-permittees encourage the participation of the County of Ventura Environmental Health Department (EHD) in these discussions and to provide comments and guidance in the development of educational materials.

EHD plays an important role in the Co-permittees' efforts to inspect and assure compliance with stormwater regulations in the business community countywide. EHD conducts stormwater inspections of automotive service facilities on the behalf of several Co-permittees, and also performs the County unincorporated program for food service inspections. Implementation of these program elements requires the Co-permittees to spend significant time and resources on communication, coordination, and comprehensive training, both for Co-permittee staff as well as EHD inspection staff.

Although the Co-permittees need the flexibility to develop inspection programs that are appropriate for local conditions, the Co-permittees have worked hard to incorporate similar baseline elements in their individual programs. To define these baseline elements, the Co-permittees continue to discuss standards and approaches for conducting inspection activities. The Co-permittees continue to work on coordination and providing the business community of Ventura County a fair and congruent inspection program.

JOINT INDUSTRIAL SITE INSPECTIONS

This past year VCWPD, in coordination with the RWQCB, targeted several state permitted industrial sites for a joint inspection program. With recent regulatory changes that require Co-permittees to visit and educate industrial operators these facilities are now subject to several layers of

regulation. The Co-permittees recognize the potential for problems with these facilities being subjected to different inspection agencies and the likelihood of industrial operators receiving different direction and feedback on how to best implement stormwater pollution prevention measures and meet state permit compliance. In order to avoid this situation and ensure continued countywide consistency with respect to BMP selection and implementation, VCWPD staff with RWQCB inspectors visited several state permitted industrial facilities sites for joint inspections. These inspections provided both VCWPD and the RWQCB an opportunity to see the other in action and the chance to discuss at length their style, method and primary concerns at industrial facilities.

The results of these joint inspections were discussed in detail at the Business Subcommittee meetings where the Co-permittees were able to evaluate the best way to not only ensure a consistent countywide approach but also the best method to streamlining the regulatory process for the industrial community. These discussions are on-going with the Co-permittees committed to protecting stormwater quality in Ventura County and implementing an inspection program that is efficient and responsive to the industrial business community.

PLANNING & DEVELOPMENT PROGRAM

The Co-permittees have developed and implemented a Program for Planning and Land Development that addresses the planning of development projects. This program describes the minimum standards that the Co-permittees follow to implement their own development planning programs in compliance with Permit requirements.

The goal of this program is intended to assure that appropriate post-construction BMPs are included in priority planning development and redevelopment project plans and designs to:

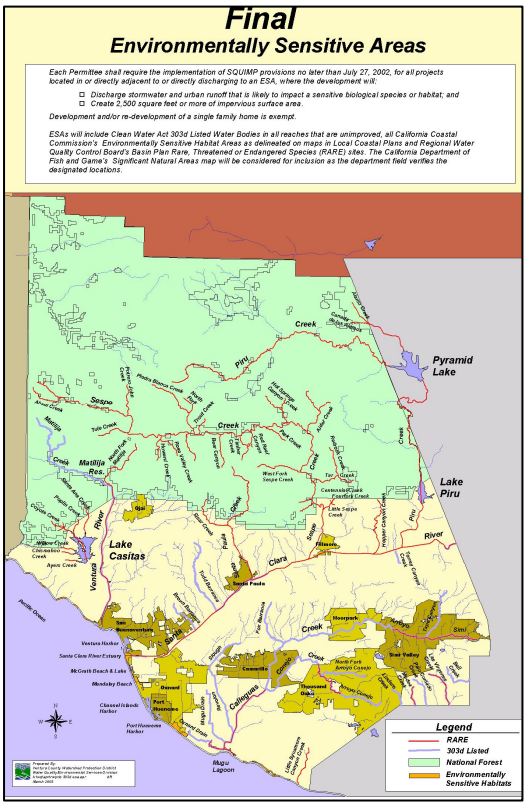
- Minimize impacts from stormwater and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA (Cal. Pub. Resources Code § 13369, SWA §402(p), CWA § 404, CZARA § 6217(g), ESA § 7, and local government ordinances
- Maximize the percentage of pervious surfaces to allow percolation of stormwater into the ground
- Minimize the quantity of stormwater directed to impervious surfaces and the MS4
- Properly design and maintain treatment control BMPs in a manner that does not promote the breeding of vectors
- Provide for appropriate permanent measures to reduce stormwater pollutant loads in stormwater from development sites

The Co-permittees recognize that development and redevelopment projects have the potential to discharge pollutants to stormwater. Therefore, the Co-permittees approach stormwater concerns early in the project development process when options for pollution control are greatest and the cost to incorporate these controls into new projects is least.

In planning and reviewing a development project, the Co-permittees consider three key questions with respect to stormwater quality control: (1) what kind of water quality controls are needed?; (2) where should controls be implemented?; (3) what level of control is appropriate? In an

effort to provide guidance and countywide consistency in answering these important questions, the Co-permittees developed and have implemented a Development Standards Technical Manual. The manual includes guidance for implementing the Stormwater Quality Urban Impact Mitigation Plan (SQUIMP) as well as detailed information for the selection, design and maintenance of post-construction BMPs.

In order to provide sound guidance in the Technical Manual, the Co-permittees developed and implemented a study to evaluate "post-development peak stormwater runoff discharge rates to maintain or reduce pre-development downstream erosion." The Urban Stream Erosion Prevention Model (USEP) objective was to setup, calibrate and validate the USEPA Hydrologic Simulation Program in a small watershed (upper reaches of Arroyo Simi) for 'current/recent' hydrologic conditions. The study's results have provided the Co-permittees with peak flow criteria for designing BMPs for projects subject to SQUIMP requirements and has been included in the Technical Manual.



Final Environmentally Sensitive Areas Map

In addition, each Co-permittee has reviewed their internal planning procedures for preparing and reviewing California Environmental Quality Act (CEQA) and National Environmental Quality Act (NEPA) documents and has linked stormwater quality mitigation conditions to legal discretionary project approvals. Furthermore, the Co-permittees have identified environmentally vulnerable areas where more stringent stormwater quality control measures are warranted. All projects located in or directly adjacent to or directly discharging to an ESA where development would:

- Discharge stormwater and urban runoff that is likely to impact a sensitive biological species or habitat; and
- Create 2,500 square feet or more of impervious surface area

are subject to SQUIMP provisions and conditioning. As well as required by the Permit, these protective measures emphasize the Co-permittees commitment to mitigating water quality degradation caused by human activities.

PROGRAM HIGHLIGHTS

ENVIRONMENTALLY SENSITIVE AREAS

Some areas, due to their plant or animal life or their habitats, are at risk to water quality degradation caused by human activities and may require special consideration. The Permit requires identification of these areas [referred to as Environmentally Sensitive Areas (ESAs)] for the purpose of conditioning development projects planned in these vulnerable areas.

The Permit required the identification of ESAs by January 27, 2001. The Co-permittees submitted a list of criteria for the purpose of defining ESAs in Ventura County to the RWQCB by

the permit deadline. This definition was rejected by the RWQCB and deemed insufficient. In November 2001, the Co-permittees submitted a revised definition of ESAs with the modified SMP. Again, the RWQCB deemed the definition incomplete and requested further refinements.

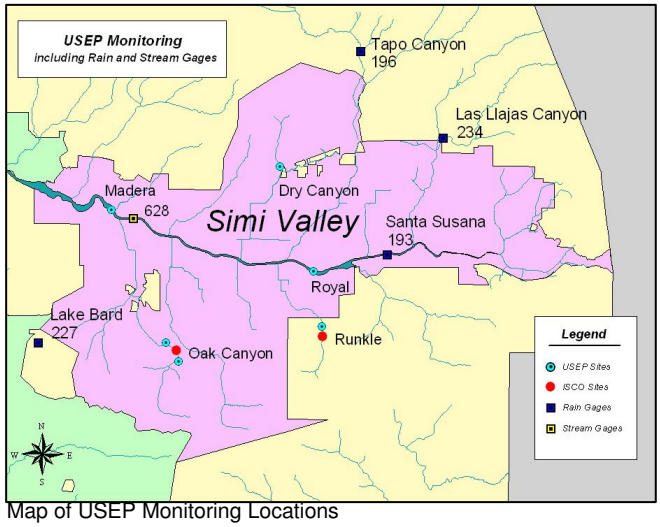
On July 1, 2002, the Co-permittees again submitted a revised approach for ESA designations. This approach required the implementation of SQUIMP provisions for all projects located in or directly adjacent to or directly discharging to an ESA, where development would:

- Discharge stormwater and urban runoff that is likely to impact a sensitive biological species or habitat; and
- Create 2,500 square feet or more of impervious surface area

ESAs were defined as Clean Water Act 303(d) listed water bodies in all reaches that are unimproved and all California Coastal Commission's *Environmentally Sensitive Habitat Areas* as delineated on maps in Local Coastal Plans and Regional Water Quality Control Board's Basin Plan Rare, Threatened or Endangered Species (RARE) sites. The California Department of Fish and Game's *Significant Natural Areas* map would be considered for inclusion as the department field verifies the designated locations. The Co-permittees and the RWQCB have now finalized the ESA designations. In addition, the Co-permittees have created a countywide map depicting these areas and have made it available to all interested parties.

USEP STUDY

As areas undergo urban development, surfaces that allow stormwater to percolate into the ground are usually made less pervious and alterations to natural drainage systems are constructed to convey stormwater runoff from urbanized areas. These alterations result in increases of both runoff volume and runoff rates in natural streams and rivers. Several reports and case studies on mostly perennial steams suggest that increased runoff volume and velocity from urbanization in watersheds with natural channels may contribute to channel enlargement (stream erosion) either through widening of the stream banks, down cutting of the streambed, or a combination of both. This change of the natural channel morphology may trigger instream habitat degradation.



Map of USEP Monitoring Locations

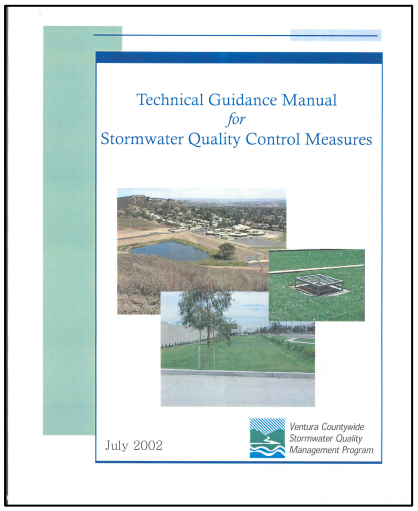
In order to better understand how urbanization and development impacts streams in Ventura County, the Co-permittees developed and implemented a study "to control the post-development peak stormwater runoff discharge rates to maintain or reduce pre-development downstream erosion." The Urban Stream Erosion Prevention Model (USEP) aimed to setup, calibrate and validate the USEPA Hydrologic Simulation Program in a small watershed (upper reaches of Arroyo Simi) for 'current/recent' hydrologic conditions. Due to some initial grant funding delays, the USEP study was temporarily slowed. However, the Co-permittees did have some preliminary data to establish design criteria for controlling post-development erosion. This interim peak flow criteria was included in the Technical Guidance Manual and submitted to the RWQCB.

After two years of study the Co-permittees have finalized the USEP Report. The study's results allowed the Co-permittees to re-evaluate the use of the information available from the model on flow-duration, flow velocity distributions, bed/bank shear stress calculations, etc. for assessing flood control facilities, streambed/bank protection efforts and urbanization impacts. Most significantly, the study assisted the Co-permittees in determining that the interim peak flow criteria for designing BMPs for projects subject to SQUIMP requirements originally included in the Technical Guidance Manual is the most appropriate.

This project illustrates the commitment and dedication the Co-permittees have in addressing real stormwater issues and implementing sound scientifically proven methods for resolving those issues. In addition, this project is the first of its kind in southern California and therefore will benefit many other regions in California, with potential application in other states.

DEVELOPMENT STANDARDS – TECHNICAL MANUAL

Protection of water quality requires that BMPs be designed in accordance with criteria sufficient to meet the requirements of the stormwater quality management program, without causing collateral, negative impacts elsewhere in the environment. In addition, science and technology of stormwater quality management continues to evolve. Therefore, it is necessary to develop BMP design criteria and then periodically update the criteria to reflect the current state of knowledge and available technologies.



Technical Guidance Manual

In 2002, the Co-permittees were required to develop and implement a Technical Guidance Manual to address BMP design criteria protocols. The manual was required to include:

- Specifications for treatment control BMPs and structural BMPs based on the flow-based and volume-based water quality design criteria in the SQUIMP
- Criteria that can be implemented consistently throughout the permit area
- Criteria for the control of discharge rates and duration for the purposes of maintaining or reducing pre-development downstream erosion and for protection stream habitat

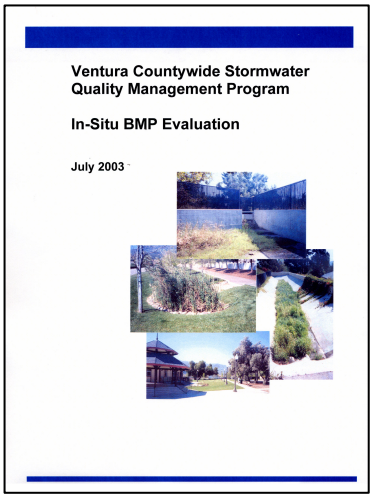
In July of 2002, the Planning and Land Development Subcommittee with the assistance of Larry Walker and Associates, completed preparation of the Technical Guidance Manual for submittal to the RWQCB by the permit deadline (July 27, 2002).

The Manual addresses SQUIMP requirements of the NPDES permit and specifies design storm volumes and flows, and identifies various site, source, and treatment control BMPs applicable to Ventura County and the SQUIMP project categories (e.g. automobile repair shops, restaurants, commercial development, etc.). Ultimately the Manual provides design guidance for site design (e.g. reduction of impervious areas), source and treatment control BMPs. Fact sheets were developed for each BMP and provide detail descriptions of the BMPs and where applicable design criteria. For the treatment control BMPs, a step-by-step design process (including electronic design worksheets) was developed and typical design details provided. In addition, guidance was provided regarding the effectiveness of the BMPs, operation and maintenance requirements, and design examples. Revisions to the Manual were provided in November 2002 and February 2003. This manual is

applied Countywide and provides for a consistent and equitable approach to land development within Ventura County.

BMP EVALUATION STUDY

In addition to monitoring stormwater discharges, the Co-permittees implemented an In-Situ BMP Evaluation study. Many new and redevelopment projects have been conditioned by the Co-permittees to mitigate stormwater impacts with the use of a variety of Best Management Practices (BMPs). The Co-permittees realized that in order to assess the effectiveness of these measures to protect water quality an evaluation of BMPs was needed. In October 2002, the Co-permittees hired a consultant to evaluate a series of BMPs in different locations throughout the County. Unlike other BMP studies, this evaluation goes beyond simply verifying the appropriateness of the BMP for a given situation. Rather, this study evaluates whether the BMP has been installed properly, if it is being properly maintained and if the BMP is having the desired results.



BMP Report Cover

In July of 2003, the Planning and Land Development Subcommittee with the assistance of Camp, Dresser and McKee, completed preparation of the BMP Evaluation Study Report. The study's preliminary findings include design, construction, and operation and maintenance recommendations.

The Co-permittees intend to extend this study in the near future to increase their database and thus realize more meaningful results. Ultimately, study results will be used by the Co-permittees to evaluate the need for modifying BMP design criteria for increasing BMP effectiveness and mitigation of stormwater impacts.

COUNTYWIDE SQUIMP TRAINING

With the adoption of Permit CAS004002, the Co-permittees recognized the need for more in-depth training on the new SQUIMP requirements. On behalf of the Co-permittees, VCWPD provided two half-day SQUIMP Workshops in January 2002. The workshops targeted civil engineers, planners and municipal staff routinely involved with land development project design and review. Presentations by the RWQCB, VCWPD, Larry Walker and Associates (LWA), and Camp Dresser and McKee (CDM) were given. The presentation topics included the SQUIMP from a regulatory perspective, a general overview of the SQUIMP in Ventura County, making the connection between BMPs and Pollutants of Concern (POCs), and BMP Design using SQUIMP criteria. Total attendance was 150 people. VCWPD plans to offer a similar workshop and solicit the participation and attendance of the architectural community next year (Spring 2005).

CONSTRUCTION ACTIVITIES

The Co-permittees have developed and implemented a Program for Construction Sites that addresses the implementation of BMPs to control pollution of runoff from construction activities. Construction projects covered under this program include any action proposed by a property owner/developer which requires the issuance of a building or grading permit and includes construction activities such as clearing, grading, excavation, road construction, structure construction, or structure demolition that results in soil disturbance.

Construction projects have the potential to significantly affect stormwater quality. The goal of the Program for Construction Sites is to assure that appropriate BMPs are incorporated during all phases of construction. BMPs appropriate for construction activities are organized into four major categories:

- **Erosion Control**: Measures that prevent erosion and keep soil particles from entering stormwater, lessening the eroded sediment that must be trapped, both during and at the completion of construction
- **Sediment Control**: Feasible methods of trapping eroded sediments so as to prevent a net increase in sediment load in stormwater discharges from the site
- **Site Management**: Methods to manage the construction site and construction activities in a manner that prevents pollutants from entering stormwater, drainage systems or receiving waters
- **Materials and Waste Management**: Methods to manage construction materials and wastes that prevent their entry into stormwater, drainage systems or receiving waters

These BMPs address multiple construction activity-related pollutants and focus on erosion and sediment control practices, source control, education, good house-keeping, BMP evaluation/maintenance, proper waste management and good site planning.

Prior to receiving a grading permit, the Co-permittees require a Storm Water Pollution Control Plan (SWPCP) be submitted for projects that are located in a hillside areas, or will result in soil disturbance of one acre or more, or is within or discharging directly to or directly adjacent to an Environmentally Sensitive Area (ESA). In addition, the Co-permittees require all construction projects subject to the State General Construction Permit to submit proof of filing a Notice of Intent (NOI) prior to issuing a grading permit.

The Co-permittees inspect all construction sites with SWPCPs to determine if the SWPCP is adequately implemented. The SWPCP remains in effect until the construction site is stabilized and all construction activity is completed. The SWPCP includes identification of potential pollutant sources and the design, placement and maintenance of BMPs to effectively prevent the entry of pollutants from the construction site to the storm drain system. In addition, the Co-permittees require that construction projects include the following requirements:

- Sediments generated on the project site shall be retained using structural drainage controls
- No construction-related materials, wastes, spills, or residues shall be discharge from the project site to streets, drainage facilities or adjacent properties by wind or runoff

- Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the project site
- Erosion from slopes and channels will be eliminated, by implementing BMPs, including but not limited to, limiting grading during the wet season, inspecting graded areas during rain events, planting and maintaining vegetation on slopes and cover erosion susceptible slopes

In recent years, the Co-permittees have hosted several countywide General Construction Permit Compliance training workshops. These workshops have focused on State General Construction Permit compliance, and Storm Water Pollution Prevention Plan (SWPPP) development and implementation. Many of these training events have been coordinated with other governmental and construction industry representatives, including the Association of General Contractors (AGC), State Water Resources Control Board (SWRCB), Los Angeles Regional Water Quality Control Board (RWQCB), and the Association of Public Work Agencies (APWA). These events targeted both Co-permittee staff as well as members of the local construction/developer community. Widely successful, these training events reinforce the Co-permittees' belief that education is one of the primary tools to creating stormwater awareness and changing behavior.

Most recently, the Co-permittees recognized the need for a "New Homeowner" brochure to assist developers, Home Owner Associations (HOAs) and residents with their efforts to prevent non-stormwater discharges. Last year alone, the Co-permittees distributed 6,000 of these new brochures to homeowners, developers and Home Owner Associations (HOAs).

PROGRAM HIGHLIGHTS

GENERAL CONSTRUCTION PERMIT COMPLIANCE WORKSHOP/TRAINING

Over the term of the permit, the Co-permittees have emphasized the need for training and education of their inspection staff. The Co-permittees have participated in a variety of events over the past five years. Activities include:

- Associated General Construction Training
- Association Public Works Agency Construction Training
- Building Industry Association Stormwater Seminar
- Pollution Prevention for Concrete Products Workshop
- NPDES Wet Weather Compliance Training Seminar

AGC Training

VCWPD in coordination with the Associated of General Contractors of California (AGC) hosted two one-day workshops on how to comply with the General Construction Permit and BMP implementation. Presentations by the SWRCB, the RWQCB, and VCWPD were given on the regulatory foundation for the permit, Co-permittee responsibilities for implementing the permit, and the ease with which construction sites could achieve compliance with the permit. The event was a huge success with participation from municipal staff, local development and construction community

and engineering consulting firms. A total of 270 people attended, and assisted in a field demonstration of BMP application and maintenance.

APWA Construction Training

VCWPD in coordination with the Association of Public Work Agencies and the RWQCB hosted a one-day workshop that covered stormwater regulations and how to comply with the General Construction Permit. The workshop outlined the General Construction Permit and how to comply with its requirements. Approximately 50 people attended the event. The workshop's success reinforced the Co-permittees' belief that education is one of the primary tools to creating stormwater awareness and changing behavior. Thus, the Co-permittees will continue to target additional audiences for educational outreach and plan to hold training workshops as needed.

BIA Stormwater Seminar

On behalf of the Co-permittees, VCWPD participated in a daylong seminar, entitled New Stormwater Regulations and Construction/Development Projects that drew more than 270 participants in Downey, California. Presentations focused on Regional Water Board construction/development requirements, municipal construction/development requirements and potential legal actions for non-compliance. In addition to VCWPD, representatives from the RWQCB, Los Angeles County Stormwater Program, Orange County Stormwater Program, and San Bernardino Stormwater Program were present.


BIA Workshop

As a result of the recent significant changes in water quality regulations incorporated in the General Construction Permit, the Co-permittees strongly believe participation in such events is crucial to educating the construction/development community and achieving widespread compliance. The Co-permittees will continue to take advantage of similar opportunities to further stormwater awareness and facilitate compliance with permit requirements.

Pollution Prevention for Concrete Products Workshop

The Co-permittees receive a large number of illicit discharge reports related to concrete washout activities, and agreed that a workshop targeting concrete supply companies, local contractors and handymen would be appropriate. VCWPD in coordination with the City of Thousand Oaks held a one-day workshop that covered stormwater regulations and appropriate BMPs for working with concrete products. The workshop emphasized prevention of non-stormwater discharges (source control), appropriate cleaning methods, material storage, and proper disposal. A total of 57 people attended the event. The workshop's success reinforced the Co-permittees' belief that education is one of the primary tools to creating stormwater awareness and changing behavior. Thus, the Co-permittees will continue to target additional audiences for educational outreach and plan to hold training workshops as needed.

NPDES Wet Weather Compliance Training Seminar

Since 2000, the City of Oxnard has hosted an annual NPDES Wet Weather Compliance Training Seminar on how to comply with General Construction Permit requirements and stormwater regulations. This comprehensive seminar was designed to motivate and educate land developers, superintendents, subcontractors, engineers, consultants, public works inspectors, and any individual who has the potential to generate or prevent stormwater pollution and/or is directly responsible for the preparation, implementation and compliance inspection of the Storm Water Pollution Prevention Plan (SWPPP).

Training focuses on the implementation of Best Management Practices (BMPs) during various construction activities to adequately prevent the discharge of non-stormwater pollutants or sediment-laden water into the storm drain system and consequently the ocean. In addition, the seminar emphasizes general NPDES Permit prohibitions and requirements that each construction site of one acre or greater must comply with year round. This past year's training was a huge success with 70 attendees. The City of Oxnard should be commended for their unwavering commitment to provide such training venues, which are crucially to successfully training the construction/development community and achieving compliance. The seminar's on-going success is evident in the notable changes at construction sites and has reinforced the city's belief that education is the key for achieving stormwater compliance.

PHASE II

As a result of recent significant changes in water quality regulations, the Co-permittees in coordination with the RWCB notified and provided educational outreach to construction sites that were now subject to the General Construction Permit when Phase II went into affect (March 2003). The Co-permittees strongly believe that education and outreach to the construction community is crucial to engaging the construction/development community and achieving permit compliance. The Co-permittees will continue to take advantage of similar opportunities to further stormwater awareness and facilitate compliance with permit requirements.

JOINT CONSTRUCTION SITE INSPECTIONS

This last year VCWPD, in coordination with the RWQCB, targeted several state permitted construction sites for a joint inspection program. With recent regulatory changes that require construction sites of one acre or more to obtain a State General Construction Permit, more and more construction projects are now subject to several layers of regulation. The Co-permittees recognize the potential for problems with these construction sites being subjected to different inspection agencies and the possible likelihood of developers, contractors, and local homeowners receiving different direction and feedback on how to best implement stormwater pollution prevention measures at their sites. In order to avoid this situation and ensure continued countywide consistency with respect to BMP selection and implementation, VCWPD staff, with RWQCB inspectors, visited several state permitted construction sites for joint inspections. These inspections provided both VCWPD and the RWQCB an opportunity to see the other in action and the chance to discuss at length their style, method, and primary concerns at construction sites.

The results of these joint inspections were discussed in detail at the Construction Subcommittee meetings where the Co-permittees were able to evaluate the best way to not only ensure a consistent countywide approach but also the best method for streamlining the regulatory process for the

construction community. These discussions are on going with the Co-permittees committed to protecting stormwater quality in Ventura County and implementing an inspection program that is efficient and responsive to the construction community.

NEW HOMEOWNER BROCHURE DEVELOPMENT

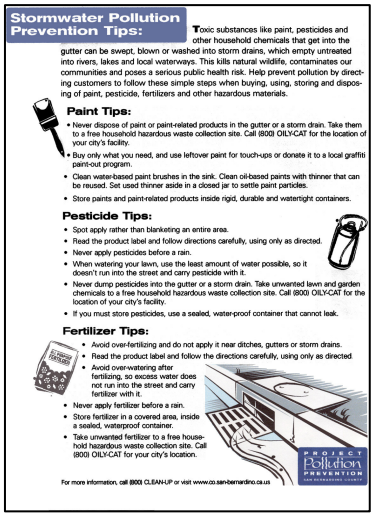
In 2003, the Co-permittees begin to discuss the need for a "New Homeowner" brochure to assist developers, Home Owner Associations (HOAs) and residents with their efforts to prevent non-stormwater discharges. A significant number of illicit discharges can occur in owner-occupied homes in a phased development project. Illicit discharges may result from concrete and masonry work, painting activities, landscaping and gardening and minor construction in and around the home. The Construction Subcommittee in coordination with the Residential/Public Outreach Subcommittee developed a brochure to address these issues. The Co-permittees finalized and distributed 6,000 of these new brochures to homeowners, developers and Home Owner Associations (HOAs) this permit year.

The Co-permittees are also encouraging the developer community to prepare their own brochures and incorporate notices and warnings regarding stormwater pollution prevention requirements into contractual agreements, CC&Rs and other new owner documents.

HOME DEPOT EMPLOYEE TRAINING

The City of Oxnard in coordination with Home Depot provides storm water pollution prevention training to local Home Depot employees. This training emphasizes best management practices for many common pollutants of concern (pesticides, fertilizers/nutrients, paint and hazardous material) purchased at Home Depot. By providing simple solutions to the employees for the prevention of stormwater pollution, the City of Oxnard effectively arms an additional 200 people that can educate local residents on stormwater pollution prevention. The city also provides Home Depot employees with 225 "Ask Me How to Prevent Pollution" buttons in an effort to prompt customers to ask questions.

In addition, the city distributes Pollution Prevention Fact Sheets to be placed in the paint aisles and the garden center. These fact sheets detail basic techniques and methods that homeowners can incorporate in their home improvement projects to prevent stormwater pollution. The fact sheets included tear sheets that local residents could remove and take home as friendly reminders of how easily they can help to better their environment. This proactive outreach by the City of Oxnard is to be commended.


Stormwater Pollution Prevention Tips:

Toxic substances like paint, pesticides and other household chemicals that get into the gutter can be swept, blown or washed into storm drains, which empty untreated into rivers, lakes and local waterways. This kills natural wildlife, contaminates our communities and poses a serious public health risk. Help prevent pollution by directing customers to follow these simple steps when buying, using, storing and disposing of paint, pesticide, fertilizers and other hazardous materials.

Paint Tips:

- Never dispose of paint or paint-related products in the gutter or a storm drain. Take them to a free household hazardous waste collection site. Call (800) OILY-CAT for the location of your city's facility.
- Buy only what you need, and use leftover paint for touch-ups or donate it to a local graffiti paint-out program.
- Clean water-based paint brushes in the sink. Clean oil-based paints with thinner that can be reused. Set used thinner aside in a closed jar to settle paint particles.
- Store paints and paint-related products inside rigid, durable and watertight containers.

Pesticide Tips:

- Spot apply rather than blanketing an entire area.
- Read the product label and follow directions carefully, using only as directed.
- Never apply pesticides before a rain.
- When watering your lawn, use the least amount of water possible, so it doesn't run into the street and carry pesticide with it.
- Never dump pesticides into the gutter or a storm drain. Take unwanted lawn and garden chemicals to a free household hazardous waste collection site. Call (800) OILY-CAT for the location of your city's facility.
- If you must store pesticides, use a sealed, water-proof container that cannot leak.

Fertilizer Tips:

- Avoid over-fertilizing and do not apply it near ditches, gutters or storm drains.
- Read the product label and follow the directions carefully, using only as directed.
- Avoid over-watering after fertilizing, so excess water does not run into the street and carry fertilizer with it.
- Never apply fertilizer before a rain.
- Store fertilizer in a covered area, inside a sealed, waterproof container.
- Take unwanted fertilizer to a free household hazardous waste collection site. Call (800) OILY-CAT for your city's location.

For more information, call (800) CLEAN-UP or visit www.co.san-bernardino.ca.us

PROJECT Pollution PREVENTION

Pollution Prevention Fact Sheet

MUNICIPAL FACILITIES AND ACTIVITIES

A significant portion of the Co-permittees' activities includes the operation and maintenance of municipal infrastructure. These activities have the potential to impact stormwater quality and as such, the Co-permittees have developed and implemented a Program for Public Agencies. This program addresses the implementation of BMPs to control pollutant discharges to the storm drain system from Co-permittees activities and facilities to the maximum extent practicable (MEP).

In order to address the Co-permittees' potential impact on stormwater, the following activities have been targeted:

- Activities at Co-permittees Corporation Yards
- Drainage System Operation and Maintenance Activities
- Roadway Operation and Maintenance Activities
- Pesticide, Herbicide and Fertilizer Application and Use
- Training of Municipal Staff

Therefore the Co-permittees have developed and implemented Storm Water Pollution Control Plans (SWPCPs) for each of their respective corporate yards. Each SWPCP is a unique plan for each facility and include the following:

- Facility Assessment
- Best Management Practice Selection
- Plan Documentation and Implementation
- Evaluation
- Employee Training

In addition, the Co-permittees have implemented an inspection and cleaning program for their catch basins and other drainage facilities. The Co-permittees have also developed and implemented a street sweeping program and schedule that reflects traffic use and frequency.

The Co-permittees have developed and adopted a standardized protocol for the routine and non-routing application of pesticides, herbicides (including pre-emergents) and fertilizers. The standardized protocol includes the following minimum requirements to control the discharge of pollutants to stormwater as a result of pesticide, herbicide and fertilizer applications:

- Prohibit the application of pesticides, herbicides and fertilizers during rain events
- Prohibit the application of pesticides, herbicides and fertilizers within one day of a rain event forecasted to be greater than 0.25 inches except for application of pre-emergents
- Prohibit the application of pesticides, herbicides and fertilizers after a rain event where water is leaching or running from the application area

Each Co-permittee has targeted staff based on the type of stormwater quality and pollution issues that they could encounter during the performance of their regular maintenance activities. Training methods ranged from informal meetings to formal classroom training or self-guided training. The Co-permittees also train their staff on prevention, detection and investigation of illicit discharges and illegal connections.

Recently the Co-permittees have stressed the importance of integrated pest management (IPM) to weed management. With increasing regulations on the use of pesticides and the growing awareness of environmental impacts from pesticide use, the Co-permittees have begun exploring alternatives and implementing BMPs that mitigate their impacts on local ecosystems. The Co-permittees have found that they could incorporate these strategies with only minor modifications to

their maintenance activities. The Co-permittees continue to take forward, progressive approaches to their responsibilities.

PROGRAM HIGHLIGHTS

TOURS OF CO-PERMITTEES' CORPORATION YARDS

The Public Infrastructure Subcommittee meets on a monthly basis to discuss permit compliance issues and protection of stormwater as it relates to government activities. Subcommittee members take this opportunity to share ideas and discuss new and innovative BMPs for the protection of stormwater quality. Presentations by Subcommittee members and guest speakers allow members to share experiences, successful BMP practices and new technology and ideas. Participation in these meetings has been instrumental in the many new stormwater protection improvements at corporation facilities throughout Ventura County.

Tour of City of Thousand Oaks' Corporate Yard

As an educational exercise, some of the Subcommittee meetings included site visits to other government corporation yard facilities located throughout Ventura County. These visits provide the Co-permittees with the unique opportunity to see first hand how potential problems were identified and corrected. This exercise has fostered a growing dialogue among the Co-permittees and has been such a great success that the Co-permittees plan to continue this activity next permit year.

CORPORATE YARD SWPCP INSPECTION FORM

In 2002, the Co-permittees developed and implemented Storm Water Pollution Control Plans (SWPCPs) at their corporate yards. Once implemented, the permit requires annual inspections of the corporate yards to evaluate the implementation and effectiveness of the SWPCP. In order to facilitate this process, the Public Infrastructure Subcommittee began discussions on what components of the SWPCP should be evaluated and how best to conduct inspections. As a product of these discussions, the Subcommittee developed a model inspection form that the Co-permittees could implement at their yards. The Co-permittees readdress these annual inspections at subcommittee meetings, where they discuss the successes and lessons learned that may be incorporated in future inspections.

REGIONAL BOARD AUDIT OF CO-PERMITTEES' CORPORATION YARDS

This past year, each of the Co-permittees underwent an audit inspection of their corporation yards by the RWQCB to evaluate compliance with stormwater requirements. Tetratech, Inc. assisted RWQCB in conducting the audits, which included, but was not limited to, inspection of areas used

for outdoor storage, vehicle washing, vehicle maintenance, fueling operations, and chemical storage. Housekeeping practices, along with availability and implementation of a SWPCP were also evaluated.

When appropriate, individual Co-Permittees were required to submit a Compliance Schedule for correcting any noted deficiencies. These were due to RWQCB by the end of April 2004. Corresponding Final Compliance Reports were submitted in May 2004. While all items noted by the auditors were minor and easily rectified, the Co-permittees were energized by the opportunity to further enhance their efforts to mitigate stormwater pollution at their facilities. All of the Co-Permittees were in compliance with the schedule set by RWQCB and should be commended for their speedy and comprehensive response to the audit findings.

AQUATIC PESTICIDE NPDES PERMIT

In March 2001, the Ninth Circuit Court of Appeals determined that discharges of pollutants from the use of aquatic pesticides to waters of the United States require coverage under an NPDES permit (General Permit No. CAG 990003). Coverage under this General Permit is for public entities that discharge pollutants to water bodies associated with the application of aquatic pesticides for resource or pest management. This permit is required regardless if the public entity is already covered by a municipal NPDES permit. This General Permit applies to aquatic pesticide applications directly into a water body and/or directly to organisms in the water or on the water surface with the purpose and intent of killing the target aquatic organisms. The impacts of these chemicals may not be limited to the target organisms – other plants and aquatic life in the treatment area may be impacted. Due to water movement at the treatment locations, the residual pesticides can be carried to adjacent areas while concentrations in the water are still high enough to cause adverse impacts to not only aquatic organisms but also to other beneficial uses such as, irrigation, ground water recharge and recreation.

Aquatic Pesticide Spraying

During 2003, VCWPD contracted with Larry Walker Associates (LWA) to continue the implementation of a cooperative regional monitoring program with the cities of Camarillo, Port Hueneme and San Buenaventura to meet the requirements of the original General Permit. A 2003 calendar year annual report was submitted to the RWQCB January 2004.

An updated version of the Aquatic Pesticide Permit for the control of aquatic weeds (General Permit No. CAG 990005) was adopted May 2004. In response to the updated General Permit, VCWPD again contracted with LWA to file a Notice of Intent (NOI) to seek coverage under the permit. The other cooperative agencies opted to discontinue aquatic pesticide application for the coming year and did not submit NOIs for coverage under the updated General Permit. Per the requirements of the updated General Permit, VCWPD submitted an Aquatic Pesticide Application Plan (APAP) to the RWQCB July 2004. VCWPD initiated the implementation of the water quality monitoring program detailed in the APAP during the 2004 aquatic pesticide application season.

ALTERNATIVE WEED MANAGEMENT

The requirement for a General Permit for aquatic pesticide applications prompted many of the Co-permittees to review and evaluate their current maintenance activities for maintaining their drainage systems. Several Co-permittees attended one of the several seminars hosted by the Ventura County Environmental and Energy Resources Department on Integrated Pest Management (IPM) approach to weed management. These seminars provided the Co-permittees alternative less-toxic approaches to weed control. Some Co-permittees found that they could incorporate these strategies with only minor modifications to their maintenance activities.


LESS-TOXIC PEST MANAGEMENT

CONTROLLING

WEEDS

IN YOUR GARDEN

IPM seminar handout

With increasing regulations on the use of pesticides and the growing awareness of environmental impacts from pesticide use, the Co-permittees will continue to explore alternatives and implement BMPs that mitigate their impacts on the local ecosystem. The Co-permittees forward, progressive approach is praiseworthy.

COUNTYWIDE PUBLIC AGENCY ACTIVITIES TRAINING WORKSHOP

In May 2003, VCWPD provided a training session on stormwater regulations and how they relate to municipal activities at the Maintenance Superintendents Training and Equipment Workshop. This training event was open to all Co-permittee municipal staff countywide and was well attended. The Co-permittees recognize not only the need to provide such training but believe that by performing countywide training events, there is greater consistency in the implementation of stormwater regulations and activities and limited resources are leverage to their best benefit.

ILLICIT DISCHARGES AND ILLEGAL CONNECTION ACTIVITIES

The Co-permittees have developed and implemented a Program for Illicit Discharges/Illegal Connection Response that is a combination of educational outreach tools and enforcement activities to increase the knowledge of target audiences about the impacts of stormwater pollution; to change behavior of target audiences; and to involve and engage different communities throughout the County in mitigating the impacts of stormwater pollution on our rivers, streams and oceans.

To meet the goals and objectives of this program, the Co-permittees have developed a comprehensive approach, which includes the following:

- Illicit discharge elimination
- Illegal connection elimination
- Public reporting
- Education and outreach

A primary goal of the Co-permittees is to detect and eliminate illicit discharges and illegal connections to the storm drain system to reduce pollutants to the MEP. Therefore the Co-permittees:

- Investigate, contain and clean up incidental spills/overflows
- Prohibit non-stormwater discharges to the storm drain system
- Observe the storm drain system to identify illegal connections during scheduled infrastructure maintenance
- Remove all illegal connections to the storm drain system through voluntary action or enforcement proceedings

In order to implement this program effectively, the Co-permittees recognize the importance of an informed public and an easy mechanism for reporting any suspected illicit discharges, illegal dumping and/or illegal connections. Thus, the Co-permittees have aggressively targeted various communities for education on stormwater quality management and the importance of eliminating or mitigating non-stormwater discharges to local stream and channels. In addition to providing extensive training to municipal staff the Co-permittees have developed and distribute public outreach materials (including brochures, posters, stickers, and refrigerator magnets) at local community events, public schools and countywide training workshops. Prominently displayed on the outreach material is a Stormwater Hotline where residents, business owners/managers, developers/contractors and others can report prohibited discharges, dumping or connections to the storm drain system.

PROGRAM HIGHLIGHTS

ADDITIONAL CATEGORIES FOR MATERIAL TYPE

During the 2002-03 permit term, the Co-permittees realized that the number of categories that had been traditionally used to characterize the material type (Hazardous Material, Sewage, Wastewater) resulting from an illicit discharge were limited and often resulted in many illicit discharges being characterized as "other". In order to better describe the material involved, the Co-permittees discussed at length the typical types of illicit discharges that occur within their jurisdictions and what material is often involved. These discussions were very helpful in clarifying the fact that the Co-permittees often had different ideas and opinions on how to describe these events. After much discussion the Co-permittees agreed on an additional four categories for material type. To ensure accurate reporting, the Co-permittees agreed that definitions for each class of "material type" would keep any guesswork in describing these events to an absolute minimum.

Table 3 (shown on page 29) details the categories used by the Co-permittees to describe the material type of an illicit discharge. The definitions of these various categories are solely for facilitating the Co-permittees with their characterization of material type for annual report consistency. The Co-permittees are aware that these definitions are by no means all-inclusive nor necessarily how another agency or person would define these categories.

The Co-permittees used a variety of resources in helping to define these categories including the Ventura County Environmental Health website, the RWQCB website and the Environmental Protection Agency's glossary of terms and educational outreach materials.

TYPE	DEFINITION
Hazardous Material	By-products of society that can pose a substantial or potential hazard to human health or environment when improperly managed. Posses at least one of the four following characteristics (ignitability, corrosivity, reactivity, or toxicity), or is identified as a listed waste (e.g. oil, used anti-freeze, hydraulic fluid)
Sewage	The waste and wastewater produced by residential and commercial sources and discharged into sewers, includes the sludge produced by Publicly Owned Treatment Works.
Wastewater	The spent or used water from a home, community, farm or industry that contains dissolved or suspended matter.
Building Materials	Any debris associated with construction activities used to construct a building and/or stand/alone facility, such as plaster, dry-wall, nails, wood, etc.
Landscape Debris	Excessive eroded soils, sediment and/or organic materials.
Animal Wastes	Discharge from confinement facilities, kennels, pens, recreational facilities, stables, show facilities and residential yards.
Litter/Trash	Synthetic consumer by-products
Other	Any remaining materials that do not fit into the above mentioned categories.

■ *Table 3: Material Type Categories for Illicit Discharges*

CITY OF CAMARILLO STORM DRAIN CURB MARKERS

In addition to marking their storm drain inlets with a pollution prevention message, the City of Camarillo has implemented the use of storm drain curb markers with a phone number to report illicit discharges. This creative combination of two permit-required activities (provide an illicit discharge reporting number to the public and stencil storm drains with a "no dump" message) is to be commended. Consequently, the city has experienced a significant increase in the number of reports of suspicious substances in the gutter and drain. This resourceful approach has proven a great success for the city in their efforts to improve illicit discharge reporting and the city plans to implement the markers citywide.

Example of Storm Drain Curb Marker

CITY OF SAN BUENAVENTURA ILLICIT DISCHARGE HOTLINE

The City of San Buenaventura has implemented an innovative means to provide city employees and residents with a tool to report illicit discharges. The city distributed a static-cling windshield sticker that displays the city's Illicit Discharge Hotline phone number to all city vehicles along with a flyer that describes illicit discharges and encourages employee participation in this program. The Hotline is staffed by a full-time inspector dedicated to improving stormwater quality and responds to all employee and resident illicit discharge reports. The city has empowered their entire municipal field staff with the tools and knowledge to combat stormwater pollution and should be commended for their pioneering efforts.

Static-cling Windshield Sticker

POLLUTION PREVENTION FOR CONCRETE PRODUCTS WORKSHOP

VCWPD in coordination with the City of Thousand Oaks held a one-day workshop that covered stormwater regulations and appropriate BMPs for working with concrete products. The workshop was coordinated with the Program for Construction sites and emphasized prevention of non-stormwater discharges (source control), appropriate cleaning methods, material storage, and proper disposal. For more information regarding this event, see Section 3: Construction Sites (shown on page 21).

FROZSUN FOOD FACILITY ENFORCEMENT ACTION

In 2002, the City of Oxnard during a routine inspection of Frozsun Foods facility (Oxnard) discovered that a seal on the bypass valve had been cut and the valve was in the open position. This allowed process wastewater to be discharged without treatment. In addition, containment drums that had been installed in the storm drain catch basins were removed and submersible pumps that directed wastewater back to the treatment system were inoperable. This condition allowed untreated strawberry waste to enter the storm drain system.

Evidence of illicit discharge to storm drain system

The City inspectors documented the prohibited discharge and issued a Notice of Violation. Due to the magnitude of the violation the City Attorney's office initiated enforcement proceedings against Frozsun. Frozsun eventually settled the matter out of court for a substantial monetary penalty.

Evidence of strawberry waste discharged to storm drain system